



NETWORK ADJUSTERS, INC

• CLAIMS ADMINISTRATORS • ADJUSTERS • INVESTIGATORS

Stanford Place I, 8055 E Tufts Ave, Ste 600, Denver, CO 80237 (303) 221-9663

SENT CERTIFIED MAIL, REGULAR US MAIL AND EMAIL

May 22, 2023

9214:8901-9403:8316:5058:64

TALLEY LAW
145 East Main Street
Dandridge, TN 37725
Attn: P. Richard Talley

9214:8901-9403:8316:5060:14

Cafe420, LLC
745 Parkway Ste 10
Gatlinburg, TN 37738
Attn: Amy Knight

Re:

Insured: CAFE420, LLC
Date of loss: 10/09/22
Loss Location: 745 parkway, STE 10, Gatlinburg TN 37738
Our Claim #: CGF000582
Policy #: AFPKG-TN-02126-00
Policy Effective Date: 5/15/2022 to 5/15/2023

Dear Mr. Talley,

Network Adjusters, Inc. is the Third-Party Administrator for American Federation Insurance Company ("AFIC"). In future correspondence please refer to our claim number.

On 4/12/23 we sent you a Reservation of Rights Letter with regard to the above referenced date of loss for this reported claim on behalf of your client Amy Knight. In that letter we notified you that AFIC was formerly Reserving its Rights under Policy #AFPKG-TN-02126-00. To date, AFIC has not yet received the requested supporting documentation from Ms. Knight for one of the required Protective Safeguards per the Policy Conditions, specifically for the Central Station Fire Alarm System, with the original installation invoices, routine inspection reports, and testing and maintenance records by the company that serviced the Central Station Fire Alarm System.

In addition, the formal Reservations of Rights letter cited the Conditions of the Policy, specifically the Duty Cooperate with us in the investigation or settlement of the claim, and AFIC's right to request an examination under oath about any matter relating to this insurance or the claim.

(Please see enclosed copy of the Reservation of Rights Letter dated 4/12/23.)

furthermore, we request within 5 business days of receipt of this follow up correspondence that you please inform us if Ms. Knight, plans to proceed forward with this claim and or submit to us the requested Protective Safeguard supporting documentation for the Central Fire Alarm system, by then. If we should not hear from your office by then or the requested supporting documentation is not received by then, AFIC will proceed to schedule a formal examination under oath. The Law Firm below would be conducting the examination under oath on behalf of AFIC:

Chelsea N. Hayes
Associate Attorney
Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C.
602 Sevier Street, Suite 300
Johnson City, TN 37604

American Federation Insurance Company reservation of rights is based on the facts as now known and the information provided to date. American Federation Insurance Company reserves all of its rights under the contract of insurance, the controlling statutes, case law and otherwise. Specifically, American Federation Insurance Company reserves the right to deny coverage for any reason under the contract of insurance, law, or otherwise as its continuing investigation may warrant. American Federation Insurance Company further reserves the right to request additional information as needed to issue a supplemental coverage opinion position.

Additionally, American Federation Insurance Company actions do not constitute a waiver of its right to later issue an amended reservation of rights or disclaimer, assert all policy provisions, limitations or exclusions that may apply to this claim, or to commence a declaratory judgment action to obtain a judicial determination of its obligations under the policy or to rescind the policy. American Federation Insurance Company hereby reserves the right to continue to fully investigate coverage available for this claim, and to issue a supplemental coverage opinion as warranted.

If you have any questions, please contact the undersigned. We thank you for your understanding concerning this matter.

Sincerely,

Dean Ulibarri

Dean Ulibarri
General Adjuster
Network Adjusters, Inc. on American Federation Insurance Company
(720) 457-4352
dulibarri@networkadjusters.com

TENNESSEE - Chapter 356, Section 12 (b) (1):

"It is a crime to knowingly provide false, incomplete or misleading information to an insurance company for the purpose of defrauding the company. Penalties include imprisonment, fines and denial of insurance benefits."

cc:

MHP Group LLC
V25 Pompton Avenue, Suite #101
Verona, NJ 07044

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